

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE	*	
	*	CASE NO. 13-06816 ESL
FERDINAND GARCIA RODRIGUEZ	*	
	*	CHAPTER 13
<u>DEBTOR</u>	*	

**DEBTOR'S MOTION REQUESTING ORDER
RE: AUTHORIZATION TO USE FUNDS FROM LIQUIDATION OF SICK LEAVE 2013**

TO THE HONORABLE COURT:

NOW COMES, **FERDINAND GARCIA RODRIGUEZ**, debtor, through the undersigned attorney, and very respectfully states and prays as follows:

1. The debtor's confirmed Plan dated November 18, 2013, provides that debtor's "tax refunds and employer's liquidation of sick days" will be paid into the Plan. See docket no. 20.

2. The debtor has received the 2013 employer's liquidation of sick leave for the year 2013, in the sum of \$1,086.41. Attached is copy of the check as received from the debtor's employer, *Gobierno Municipal de Cidra*, dated March 3, 2014.

3. The debtor respectfully submits to the Court that he needs these funds to pay for: purchase a washing machine and new car tires.

4. The debtor is living within a very "tight" budget which barely covers the household monthly expenses and a Plan payment of \$150.00.

5. Based on the abovestated, the debtor respectfully requests this Court to Order the authorization of the use of these funds to allow the debtor to pay for this expense with the "2013 sick leave liquidation".

WHEREFORE, debtor, through the undersigned attorney respectfully requests that this Honorable Court grant the foregoing motion and allow the use of the funds from the

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2013 "sick leave liquidation" by the debtor to pay for the above stated expense.

NOTICE: Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006 (f) if you were served by mail, any party against whom this paper has been served, or any other party to the action that objects to the relief sought herein shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF system which will send notice of same to the Chapter 13 Trustee, Jose Ramon Carrion Morales, Esq.; I also certify that a copy of this motion was sent via US Mail to Ferdinand Garcia Rodriguez, PO Box 9964 Cidra PR 00739; and to all creditors and parties in interest as per the attached master address list.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 17th day of March, 2014.

/s/ Roberto Figueroa Carrasquillo
RFIGUEROA CARRASQUILLO LAW OFFICE PSC
USDC #203614
ATTORNEY FOR PETITIONER
PO BOX 186 CAGUAS PR 00726
TEL NO 787-744-7699 FAX 787-746-5294
Email: rfigueroa@rfclawpr.com

NOMBRE DEL EMPLEADO			H			NUMERO DE SEGURO SOCIAL			FECHA DEL PERIODO		
FERDINAND GARCIA RODRIGUEZ			*** ** 7400						03/03/2014		
INGRESOS			DEDUCCIONES						CONTRIBUCIONES		
DESCRIPCION	HORAS	CANTIDAD	DESCRIPCION	CANTIDAD	ACUMULADAS	TIPO	CANTIDAD	ACUMULADAS			
LVE	90.23	1176.41	MEDICARE	17.06	70.94	SEG. SOC.	72.94	303.34			
			SEGURO CH		4.36	CONT			90.96		
			MAPFRE LI		84.00						
			PLAN REFO		371.60						
			SEG INCAP		9.28						
			COOPERATI		39.86						
V75			COOPERATI		39.84	TOTAL:	72.94	374.30			
E75						FECHA DEL DEPOSITO	NUM. DEL DEPOSITO				
OTH		1106.00				03/07/2014	0639047				
GRESOS:			DEDUCCIONES CORRIENTES:			CORRIENTE:			1086.41		
GRESOS ACUMULADOS:			DEDUCCIONES ACUMULADAS:			ACUMULADO:			3878.23		
BIERNO MUNICIPAL DE CIDRA									639047		



CIDRA
BERIOS SHOPPING CENTER
BERRIOS SHPGCNT STATE RD
CIDRA, PR 00739
(787) 714-2700

GERENTE : LUIS PEREZ RIVERA

TRACKING ID# *	
Store ID #	Service Work Order #
10032074213	

CLIENTE:	Ferdinand Garcia	Año:	1999	Fecha:	2014-03-14
Dirección:	PO BOX 9984	Marca:	ISUZU TRUCK	Anotado Por:	NA
Ciudad:	CIDRA	Modelo:	TROOPER	Hora De Ingreso:	17:30:39
Estado:	PR	Motor:	V6-3494 3.5L DOHC	Fecha/Hora prometida:	2014-03-14 19:00:00
Código postal:	00739	Numero De VIN:		El carro listo partes	
Teléfono Casero:	(787)702-0870	Numero De la Licencia:	1	Viejas requeridas por	no
Teléfono Del Contacto:	(787)702-0870	Mileaje adentro y hacia fuera:	1 /	el cliente?	
		Color:			

Estimado Inicial	Cargos Por Piezas	Cargos De Trabajo	Cargos Totales	Fecha Y Hora:	Tarifa De Trabajo
	614.76	39.96	700.55	2014-03-14 17:30:39	80.00/80.00

TYPE	PART	DESCRIPTION	CODE	MECHANIC	HRLY RATE	HRS	QTY	SOURCE	EACH	TOTAL
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Not Yet Authorized

PK	9084807	TIRE INSTALLATION PACKAGE								
LB		TIRE MOUNTING	N				4		0.00	0.00
LB		WHEEL BALANCE PASSENGER 16-19 & TRUCK	N				4		9.99	39.96
PN	4001	ROAD HAZARD WARRANTY	N				4		16.96	67.84
PN	TV413	30413500PEP 1 1/4 RUBBER VALVE STEM	N				3		3.74	11.22
Package SubTotal: 119.02										
PN	90000004790	Futura Scrambler P24570R16	N				4		132.99	531.96
		40,000 MILE PRORATED								
PN	TV413	30413500PEP 1 1/4 RUBBER VALVE STEM	N				1		3.74	3.74

Parts: 614.76 Labor: 39.96 Other: 0.00 IVU Tax: 39.28 Lcl Tax: 6.55 Total: 700.55

Code Descriptions

N:Nuevo

* Ahora puede seguir el estatus de su Vehículo. Sólo visite www.pepboys.com y entre su numero de Tracking ID (1003 - 2074213), en el E-Service Center.

Store ID - Service Work Order



Cuando necesite un remolque? Llame Gratis a:
800-PEP-BOYS (1-800-737-2697)



A-5805
T-46320/46350

KEEP THIS SLIP FOR REFERENCE

01-11

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      ( 787 ) 653 - 1316
MANAGER ZORALDA VECCHIO LLY
      ( 787 ) 286 - 8550
ST# 2449  OP# 000008656 TE# 92 TR# 00844
HOTPOINT WSH 008465124938L 371#00 X
SUBTOTAL 371#00
TAX 1 6.000 X 22#26
TAX 2 1.000 X 3#71
TOTAL 396#97
CASH TEND 396#97
CHANGE DUE 0#00
*****
***** DUPLICATE RECEIPT *****
*****
I.V.LOTO: 28N02-82192
WM. DRABO23 MAR/22/14

# ITEMS SOLD 1

*****
***** INVALID RECEIPT - TRAINING *****
*****
CONSIGUE TODO LO QUE NECESITAS
A. PRECIOS BAJOS, TODOS LOS DIAS.
03/16/14 11:27:53

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Walmart
Save money. Live better.

Label Matrix for local noticing
0104-3
Case 13-06816-ESL13
District of Puerto Rico
Old San Juan
Sun Mar 16 08:25:24 AST 2014

COOP A/C CIDRENA
PO BOX 1490
CIDRA, PR 00739-1490

US Bankruptcy Court District of P.R.
Jose V Toledo Fed Bldg & US Courthouse
300 Recinto Sur Street, Room 109
San Juan, PR 00901-1964

COOP A/C CIDRENA
PO BOX 1498
CIDRA, PR 00739-1498

(p)BANK OF AMERICA
PO BOX 982238
EL PASO TX 79998-2238

FIRST BANK
CONSUMER DIVISION CENTER
BANKRUPTCY DIVISION- (CODE 248)
PO BOX 9146, SAN JUAN, PR 00908-0146

FIRST BANK
CONSUMER SERVICE CENTER
BANKRUPTCY DIVISION- (CODE 248)
PO BOX 9146, SAN JUAN, PR 00908-0146

GE Capital Retail Bank
c/o Recovery Management Systems Corp
25 SE 2nd Ave Suite 1120
Miami FL 33131-1605

PEP BOYS
PO BOX 981439
EL PASO, TX 79998-1439

SCOTIABANK
PO BOX 362649
SAN JUAN, PR 00936-2649

SCOTIABANK DE PUERTO RICO
G.P.O. BOX 362649
SAN JUAN, PUERTO RICO 00936-2649

SEARS
PO BOX 6189
SIOUX FALLS, SD 57117-6189

WALMART
PO BOX 530927
ATLANTA, GA 30353-0927

FERDINAND GARCIA RODRIGUEZ
PO BOX 9964
CIDRA, PR 00739-8964

JOSE RAMON CARRION MORALES
PO BOX 9023884
SAN JUAN, PR 00902-3884

MONSITA LECAROS ARRIBAS
OFFICE OF THE US TRUSTEE (UST)
OCHOA BUILDING
500 TANCA STREET SUITE 301
SAN JUAN, PR 00901

ROBERTO FIGUEROA CARRASQUILLO
PO BOX 186
CAGUAS, PR 00726-0186

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

FIA CSNA
PO BOX 982235
EL PASO, TX 79998

End of Label Matrix	
Mailable recipients	16
Bypassed recipients	0
Total	16